WOLF CREEK
NUCLEAR OPERATING CORPORATION

Richard A. Muench
President and Chief Executive Officer

March 1, 2005

WM 05-0007

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

Subject: Docket 50-482: Wolf Creek Nuclear Operating Corporation Response to Generic Letter 2004-02: Potential Impact of Debris Blockage on Emergency Recirculation during Design Basis Accidents at Pressurized-Water Reactors

Gentlemen:

In accordance with 10 CFR 50.54(f), this letter provides Wolf Creek Nuclear Operating Corporation's (WCNOC) response to NRC Generic Letter 2004-02, "Potential Impact of Debris Blockage on Emergency Recirculation during Design Basis Accidents at Pressurized-Water Reactors." Within 90 days of the date of the NRC safety evaluation report providing the guidance for performing the requested evaluation, the generic letter requires licensees to provide information regarding their planned actions and schedule to complete the requested evaluation.

Attachment I to this letter provides WCNOC's 90-day response to the requested information. Attachment II lists WCNOC's commitments contained in this letter. WCNOC will also provide the information requested by Part 2 of the generic letter by September 1, 2005. If you have any questions concerning this matter, please contact me at (620) 364-4000, or Mr. Kevin Moles at (620) 364-4126.

Very truly yours,

RAM/muench

Richard A. Muench

RAM/rlg

A116

Attachments: I Oath
II Response to NRC Generic Letter 2004-002
III List of Commitments

cc: J. N. Donohew (NRC), w/a
D. N. Graves (NRC), w/a
B. S. Mallett (NRC), w/a
Senior Resident Inspector (NRC), w/a

STATE OF KANSAS)
) SS
COUNTY OF COFFEY)

Richard A. Muench, of lawful age, being first duly sworn upon oath says that he is President and Chief Executive Officer of Wolf Creek Nuclear Operating Corporation; that he has read the foregoing document and knows the contents thereof; that he has executed the same for and on behalf of said Corporation with full power and authority to do so; and that the facts therein stated are true and correct to the best of his knowledge, information and belief.

By R A Muench
Richard A. Muench
President and Chief Executive Officer

SUBSCRIBED and sworn to before me this 1st day of March, 2005.

Cindy Novinger
Notary Public

NOTARY PUBLIC STATE OF KANSAS
CINDY NOVINGER
My Appt. Exp. 7/8/06

Expiration Date 7/8/06

**90-Day Response to NRC Generic Letter 2004-02,
Potential Impact of Debris Blockage on Emergency Recirculation during
Design Basis Accidents at Pressurized-Water Reactors**

Below is WCNOC's response to NRC issued Generic Letter 2004-02, Potential Impact of Debris Blockage on Emergency Recirculation during Design Basis Accidents at Pressurized-Water Reactors. The generic letter's "Requested Information" is shown in bold followed by WCNOC's response.

NRC Requested Information 1

Within 90 days of the date of the safety evaluation report providing the guidance for performing the requested evaluation, addressees are requested to provide information regarding their planned actions and schedule to complete the requested evaluation. The information should include the following:

NRC Requested Information 1(a):

[Provide] A description of the methodology that is used or will be used to analyze the susceptibility of the ECCS and CSS recirculation functions for your reactor to the adverse effects identified in this generic letter of post-accident debris blockage and operation with debris-laden fluids identified in this generic letter. Provide the completion date of the analysis that will be performed.

WCNOC Response 1(a):

WCNOC plans to analyze the susceptibility of the emergency core cooling system (ECCS) and containment spray system (CSS) recirculation functions for Wolf Creek Generating Station (WCGS) to the adverse effects of post-accident debris blockage and operation with debris-laden fluids identified in the Generic Letter 2004-02 using the guidance of Nuclear Energy Institute (NEI) document titled *"Pressurized-Water Reactor (PWR) Sump Performance Methodology,"* dated May 28, 2004 as supplemented by the NRC in SER dated December 6, 2004. The sump performance methodology and the associated NRC SER have been issued collectively as Nuclear Energy Institute Report NEI 04-07 (Reference 1).

The current licensing basis for WCGS as well as plant-specific features may identify exceptions and or refinements be taken to the guidance given in NEI 04-07. There are no exceptions or refinements identified at this time. Additional data from ongoing research on specific issues such as downstream effects, chemical effects, and coatings may also impact the methodology and guidance described in NEI 04-07. All exceptions or refinements to the guidance given in NEI 04-07, should they be taken, will be identified and a basis for them documented in the completed analysis. This analysis is scheduled to be completed by September 1, 2005.

NRC Requested Information 1(b):

[Provide] A statement of whether you plan to perform a containment walkdown surveillance in support of the analysis of the susceptibility of the ECCS and CSS recirculation functions to the adverse effects of debris blockage identified in this generic letter. Provide justification if no containment walkdown surveillance will be performed. If a containment walkdown surveillance will be performed, state the planned methodology to be used and the planned completion date.

WCNOC Response 1(b):

WCNOC performed a containment walkdown surveillance in May 2002. The walkdown performed was consistent with the intent of the guidance given in Nuclear Energy Institute Report NEI 02-01 (Reference 2). However, WCNOC recognizes the benefit of performing supplemental walkdowns to collect additional information that could be useful to support the analysis of the ECCS and CSS recirculation functions.

A containment coatings walkdown assessment will be performed using NEI 02-01 guidance to provide a current assessment of WCNOC's containment coatings to support the analysis of the ECCS and CSS recirculation functions. This walkdown will be completed prior to September 1, 2005.

A containment walkdown assessment will be performed using NEI 02-01 guidance to provide a current assessment of dirt, dust and lint to support the analysis of the impact of this debris source on post-accident sump performance. This walkdown will be completed prior to September 1, 2005.

References

1. Pressurized Water Reactor Sump Performance Evaluation Methodology, NEI 04-07, Revision 0, Nuclear Energy Institute, 1776 I Street N. W., Suite 400, Washington D.C., December 2004
2. Condition Assessment Guidelines: Debris Sources Inside PWR Containments, NEI 02-01, Revision 1, Nuclear Energy Institute, 1776 I Street N. W., Suite 400, Washington D.C., September 2002

LIST OF COMMITMENTS

The following table identifies those actions committed to by Wolf Creek Nuclear Operating Corporation in this document. Any other statements in this letter are provided for information purposes and are not considered to be regulatory commitments. Please direct questions regarding these commitments to Mr. Kevin Moles, Manager Regulatory Affairs at Wolf Creek Generating Station, (620) 364-4126.

Regulatory Commitment	Due Date
1. WCNOC will provide Part 2 of the information requested in Generic Letter 2004-02 to the NRC.	September 01, 2005.
2. WCNOC will perform an analysis of the susceptibility of the Emergency Core Cooling System and Containment Spray System recirculation functions to the adverse effects of post-accident debris blockage and operation with debris-laden fluids using the guidance of NEI 04-07. All exceptions or refinements to the guidance given in NEI 04-07 will be identified and a basis for them documented in the completed analysis.	September 01, 2005.
3. WCNOC will perform a containment coatings walkdown assessment using NEI 02-01 guidance to provide a current assessment of WCNOC's containment coatings to support the analysis of the ECCS and CSS recirculation functions.	September 01, 2005.
4. WCNOC will perform a containment walkdown assessment using NEI 02-01 guidance to collect information on dirt, dust and lint to support the analysis of the impact of this debris source on post-accident sump performance.	September 01, 2005.